

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

Hireguru, LLC,

Plaintiff,

v.

Julius Walker McKay, Jr., McKay  
Consulting Group, LLC, and Sean Rankin,

Defendants.

C/A No.: 3:16-1669-MBS

**DEFENDANTS' ANSWERS TO LOCAL  
RULE 26.01 INTERROGATORIES**

Defendants Julius Walker McKay, Jr., McKay Consulting Group, LLC, and Sean Rankin, by and through their undersigned attorneys, hereby answers the interrogatories propounded under local Rule 26.01 of the United States District Court for the District of South Carolina.

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**Answer: N/A: Defendants are not aware of any party having a subrogation interest in the claims asserted in Plaintiff's Complaint.**

(B) As to each claim, state whether it is to be tried by a jury or non-jury and why.

**Answer: Plaintiff has not demanded a jury trial in his Complaint.**

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each public owned company in which the party owns ten percent or more of the outstanding shares.

**Answer: N/A: Defendant McKay Consulting Group, LLC is not a publicly owned company.**

(D) State the basis for asserting the claim and the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**Answer: N/A: This suit was commenced in the Court of Common Pleas for the Fifth Judicial Circuit, County of Richland, South Carolina, and is now being removed to this Court by consent of all Defendants. The Columbia Division is proper pursuant to 28 U.S.C. §§ 1441(a) and 121(2) and Local Rule 3.01 (D.S.C.).**

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal?

**Answer: No.**

Respectfully submitted,

s/ John J. Pringle Jr.  
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McKay Consulting Group, LLC, and Sean Rankin*

May 24, 2016.